

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TERRENCE REYNOLDS,

Plaintiff,

-against-

DOCKET NO.: 1:23-cv-09792-DEH

**DECLARATION OF CATHRYN
HARRIS-MARCHESI IN
SUPPORT OF PLAINTIFFS
OPPOSITION TO DEFENDANTS
MOTION TO DISMISS THE
COMPLAINT**

THE CITY OF NEW YORK,
GEROULD MCCOY (*in his
individual and official capacity*),
HAMAN (*in his individual and
official capacity*), CHRISTOPHER
MARTELL (*in his individual and
official capacity*) and MICHAEL
PARENTE (*in his individual and
official capacity*),

Defendants.

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Cathryn Harris-Marchesi, Esq., declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am of Counsel to The Law offices of Geoffrey T. Mott, P.C., attorneys for Plaintiff, TERRENCE REYNOLDS in the above-captioned proceeding. As such, I am fully familiar with the facts and circumstances set forth herein, and I submit this declaration in support of Plaintiffs' Opposition to Defendants Motion to dismiss the Complaint.

2. I submit this declaration in support of Plaintiff, TERRENCE Opposition to Defendants Motion to dismiss the Complaint.

3. Exhibit A hereto is the complaint filed on November 7, 2023, by Plaintiff TERRENCE

REYNOLDS in the matter of TERRENCE REYNOLDS v. THE CITY OF NEW YORK, GEROULD MCCOY (*in his individual and official capacity*), HAMAN (*in his individual and official capacity*), CHRISTOPHER MARTELL (*in his individual and official capacity*) and MICHAEL PARENTE (*in his individual and official capacity*), filed under case no. 1:23-cv-09792-DEH, in the United States District Court for the Southern District of New York.

4. Exhibit B hereto is the United States Civil Docket Report in the matter of TERRENCE REYNOLDS v. THE CITY OF NEW YORK, filed under case no. 1:22-CV-01910-vec in the U.S. District Court for the Southern District of New York.

5. Exhibit C hereto is the Second Circuit Court of Appeals Decision in the matter of TERRENCE REYNOLDS v. THE CITY OF NEW YORK filed under case no. 23-76 in the Second Circuit Court of Appeals.

Date: Woodbury, New York
May 13, 2024

Respectfully submitted,

/s/ Cathryn Harris-Marchesi
Cathryn Harris-Marchesi, Of Counsel
The Law Offices of Geoffrey T. Mott, P.C.
7600 Jericho Turnpike, Suite 105
Woodbury, New York, 11797
Attorneys for Plaintiff